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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Echo & Rig Sacramento, LLC, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

AmGUARD Insurance Company,

Defendant.

Case No. 2:23-cv-00197-DJC-JDP

**Stipulation and Order for
Extension of Time re Motion to Dismiss
Briefing Schedule**

WHEREAS, on April 20, 2023, Plaintiff Echo & Rig Sacramento, LLC filed its First Amended
Complaint (Dkt. No. 21);

WHEREAS, on May 4, 2023, Defendant AmGuard Insurance Company filed a Motion to
Dismiss the First Amended Complaint (Dkt. No. 23);

1 WHEREAS, in accordance with Local Rule 230(c) and 230(d), Plaintiff's opposition to
2 Defendant's Motion to Dismiss is currently due on May 18, 2023, and Defendant's reply is currently due
3 on May 30, 2023;

4 WHEREAS, no party has previously sought any extension of time for the opposition and reply
5 briefs;

6 NOW, THEREFORE, under Local Rules 143 and 144, to allow the Parties adequate time to
7 thoroughly address the issues raised in Defendant's Motion to Dismiss, the parties stipulate to a one-
8 week extension for the opposition brief and a one-week extension for the reply brief, subject to the
9 Court's approval, as follows:

- 10 • Plaintiff's deadline to file its opposition to Defendant AmGuard's Motion to Dismiss is
11 extended to May 25, 2023.
- 12 • Defendant's deadline to file its respective reply is extended to June 12, 2023.

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15 Dated: May 10, 2023

Respectfully submitted,

DOVEL & LUNER LLP

17 By: /s/ Richard Lyon
18 Richard Lyon

19 *Attorneys for Plaintiff Echo & Rig*
20 *Sacramento, LLC*

21 Dated: May 10, 2023

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

23 By: /s/ Deborah L. Stein (as authorized on May 10,
24 2023)

25 Deborah L. Stein

26 *Attorneys for Defendant AmGuard Insurance Company*
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ORDER

The Court having considered the foregoing Stipulation, and good cause appearing, HEREBY
ORDERS that:

- Plaintiff's deadline to file its opposition to Defendant AmGuard's Motion to Dismiss is extended to May 25, 2023.
- Defendant's deadline to file its respective reply is extended to June 12, 2023.
- The hearing on Defendant AmGuard's Motion to Dismiss, set for July 20, 2023, is VACATED and RESET for August 17, 2023, at 1:30 PM.

IT IS SO ORDERED.

Dated: May 10, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE